



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

April 26, 2023

VIA ECF

Hon. Ronnie Abrams  
United States District Judge  
United States District Court  
40 Foley Square  
New York, New York 10007

**Re: *Bambridge Accountants New York LLC v. USCIS, et al.*, No. 23 Civ. 2052 (RA)**

Dear Judge Abrams:

This Office represents the government in the above-referenced action, in which the plaintiff seeks declaratory and injunctive relief under the Administrative Procedure Act with respect to the decision of the U.S. Citizenship and Immigration Services (“USCIS”), via its Texas Service Center (the “Center”), to revoke the prior approval of plaintiff’s petition for L-1A nonimmigrant classification for an intracompany transferee (plaintiff’s president and owner). On behalf of the government, and together with plaintiff, I write respectfully to request that the Court stay all deadlines in this matter for six months (including the deadline to respond to the complaint, *i.e.*, from May 25 to November 27, 2023); adjourn the initial pretrial conference presently scheduled for April 28, 2023, *sine die*; and permit the parties to file a joint status letter by October 20, 2023.

The Administrative Appeals Office of USCIS recently issued a decision withdrawing the referenced revocation of the extension petition’s approval and providing that if the Center still wishes to revoke the approval at issue, it must issue a new Notice of Intent to Revoke. The requested relief will provide the parties an opportunity to consider USCIS’s next steps and potentially resolve this matter without the Court’s intervention. The parties thank the Court for its consideration of this letter.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

Application granted. The conference scheduled for April 28, 2023 is hereby adjourned, and the parties shall file a joint status letter by October 20, 2023.

By: s/ Joseph A. Pantoja  
JOSEPH A. PANTOJA  
Assistant United States Attorney  
86 Chambers Street, 3rd Floor  
New York, New York 10007  
Telephone: (212) 637-2785  
E-mail: joseph.pantoja@usdoj.gov  
*Attorney for Defendants*

SO ORDERED.

Hon. Ronnie Abrams  
United States District Judge  
04/27/2023

cc: Counsel of record (via ECF)